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May 21, 2024

VIA ECF

Special Master
Hon. Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower, 18th
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Philadelphia, PA 19103
TIV@stevenslee.com

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Judge Vanaskie:

I am writing to request an extension of the current deadline for the ZHP Defendants to submit their responses to Plaintiffs' proposed findings of fact and proposal for monetary sanctions pursuant to Special Master Order No. 98 ("SMO 98") (ECF [2712](#)). A proposed amended order is enclosed with this letter. Counsel for Plaintiffs have stated that they object to this request.

SMO 98, which was issued on May 10, 2024, directed Plaintiffs to: (1) submit within seven days their "proposed findings of fact consistent with an adverse inference" as described in SMO 98 and; (2) propose a monetary sanction and present a properly supported request for fees and costs within 14 days of the order. (SMO 98 at 39-40.) SMO 98 states that the ZHP Defendants shall have seven days from the date of these submissions to provide a response to Plaintiffs' proposals.

The ZHP Defendants intend to object to SMO 98 pursuant to Fed. R. Civ. P. 53(f)(2), and that submission to Judge Bumb is due May 31, 2024. As a result, the ZHP Defendants ask that SMO 98 be amended as follows:

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- The ZHP Defendants' Response to Plaintiffs' Proposed Findings of Fact shall be due seven (7) days after Judge Bumb's ruling on the ZHP Defendants' objections to SMO 98, if necessary.
- The ZHP Defendants' Response to Plaintiffs' Proposal regarding the "monetary penalty it believes is appropriate under the circumstances" shall also be due seven (7) days after Judge Bumb's ruling on the ZHP Defendants' objections to SMO 98, if necessary.

Thank you for your attention to this matter.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jessica Davidson".

Jessica Davidson

cc: All counsel of record (via ECF)